Before the

FEDERAL COMMUNICATIONS COMMISSION

Concerning: Amendment of Part 97 of the	)	
	)	
Commission's Rules Governing the Amateur	)	RM-11306
		)
Radio Services	)	

Comments in Support of RM-11306

By

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1. BACKGROUND AND INTRODUCTION:

I am Edward Pataky, holder of the Extra Class License, KO5X. I wish to make these comments in support of the American Radio Relay League's (ARRL) on proposal for Rule Making, RM-11306. I have no commercial interest the results of the proposed rule making.

2 DISCUSSION:

There seems to be a general misunderstanding of the intent of the ARRL proposal. I keep reading *"Email Robots are coming to the phone bands!"*
From the wording and discussions that I read on the two major Internet Ham Discussion sites, the assumption is that the segment designated for wide band operations is *assumed* to be the "phone band."
However, its my understanding, by reading RM-11306, that the bandwidth segmentation is separated into segments that will contain modes of operation consistent with the bandwidth segments designated for their operation. SSB

is but one such mode, in the wideband segment. It is also my understanding that these band segments will be further segmented or segregated by a *voluntary* band plan rather than by formal regulation.
Assuming this is correct; I see no value in the subject matter of these discussions other than to push and promote opposition to RM-11306. Communications technology outside the Amateur service has already migrated into a digital environment. With virtually no space on the HF Amateur bands for the advancement of digital communications that are slated for rapid transfer of digital data, there is really no reason for those who may have an interest in their further advancement to do such work since they have no available spectrum to deploy them. The US Military and the ITU have standards, or are developing such standards that which provide speeds in the 9600 bit per second range, and within a reasonable bandwidth that is no greater than the normal Single Sideband signal used today. Since most non-interactive, high speed data transmissions are not normally attended once they are initiated, and since their duration is so very much shorter than an "on-the-air" interactive conversational mode, it would appear that in order to allow such transmissions, the FCC must determine the importance of the development of these type transmissions, which would also include combined digital voice, data and image such as is used in other services in the HF spectrum.

If the purpose of Amateur radio is to remain as it is now stated in Part 97.1, then such steps as the deletion of 97.221(c) are going to be necessary, regardless of how the bands are segmented, formally through regulatory assignments, or through voluntary agreements, or both. I see no other choice. The potential for interference from such transmissions under "local and remote control" seem to be a major concern. Is this not a very valid reason for the continued development of protocol signal detection? I hear words like "hidden transmitter effect," come into effect, but because of the

nature of HF radio that is not channelized, such effects are inherent with HF propagation, regardless. During the average contest, or really, with normal operations, such "hidden transmitter effects" are always going to be a problem. Only coordinated channelization will completely eliminate the "hidden transmitter effect as it does with commercial operations. This is not consistent with the way the Amateur service operates since Part 97 does not provide specific frequencies for specific stations. Eliminating or further containing operations that are initiated by a live human being (control operator) under local or remote control per Part 97.221(c) is not going to eliminate such interference.

When Part 97.221 was written, there were no digital modes greater than 500 Hz in operation under local or remote control. Only HF Packet, which operates under fully "automatic control", was available on the HF Amateur spectrum. To continue to restrict such operations to 500 Hz or less will ***not*** continue to promote the advancement of the 'radio art' and allow for the future development of higher speed digital modes. More modern protocols need room for their development and operations. Containing such operations within a space that includes Broadcast stations (within the 5 KHz total on 40 meters), fully-automatic HF Packet, many 2.2 KHz stations currently under local and remote control, and any other domestic digital operation that wishes to operate within the Part 97.221 sub-bands, is currently strained at best. How can anyone be expected to develop anything productively within the current narrow spectrum currently provided by Part 97.221 as it exists today? It will not allow current operations during normal times, and it was proven deterrent to the operations during the recent hurricane incidents.

2. CONCLUSION

The ARRL has provided a Petition that has fairly and equitably balance the operation of current modes of operation while providing an environment

consistent with the further development of differing digital technologies. It has done this by placing modes of operation in varying band segments by their occupied bandwidth, and by asking for the additional spectrum for the further development of digital technology. Without these alterations, the Amateur service will fall further behind as other services, or Amateurs in other countries, which are less restricted, will continue to expand their technologies. Even if they become available to the US Amateur, there must be space to use them. For these reasons, I fully support RM-11306 as a sensible and practical approach toward the future of the Amateur service.

Respectfully Submitted,

Edward Pataky, KO5X